

Zachary M. Best, SBN 166035  
Tanya E. Moore, SBN 206683  
MISSION LAW FIRM, P.C.  
332 North Second Street  
San Jose, California 95112  
Telephone (408) 298-2000  
Facsimile (408) 298-6046  
E-mail: service@mission.legal

Attorneys for Plaintiff,  
Ronny-marie Wilson

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

RONNY-MARIE WILSON,

Plaintiff,

vs.

RED ROBIN INTERNATIONAL, INC. dba  
RED ROBIN BURGER & SPIRITS  
EMPORIUMS, et al.,

Defendants.

No. 5:17-cv-00685-BLF

**STIPULATION FOR DISMISSAL OF  
ACTION; ~~[PROPOSED]~~ ORDER**

**IT IS HEREBY STIPULATED** by and between Plaintiff, Ronny-marie Wilson (“Plaintiff”), and Defendant, Red Robin International, Inc. dba Red Robin Gourmet Burgers (erroneously sued as Red Robin International, Inc., dba Red Robin Burger and Spirits Emporiums) (“Defendant,” and together with Plaintiff, “the Parties”), the parties remaining in this action, by and through their respective counsel, that pursuant to Federal Rule of Civil Procedure 41(a)(2), the above-captioned action be dismissed with prejudice.

**IT IS FURTHER STIPULATED** between Plaintiff and Defendant that the Court shall expressly retain jurisdiction over this matter for the purpose of adjudicating any subsequent

STIPULATION FOR DISMISSAL OF ACTION; [PROPOSED] ORDER

1 motion Plaintiff may bring to recover her attorneys' fees and costs. Any such motion shall be  
2 filed within 45 days of the date the Court issues its Order on this stipulation.

3  
4 Dated: May 17, 2018

MISSION LAW FIRM, A.P.C.

5  
6 /s/ Tanya E. Moore

Tanya E. Moore  
Attorneys for Plaintiff,  
Ronny-marie Wilson

7  
8  
9 Dated: May 17, 2018

FISHER & PHILLIPS LLP

10 /s/ Alden J. Parker

11 Alden J. Parker  
Katherine P. Sandberg  
Attorneys for Defendant/Cross-Defendant,  
Red Robin International, Inc.  
dba Red Robin Gourmet Burgers  
(erroneously sued as Red Robin Burger and  
Spirits Emporiums)

12  
13  
14  
15  
16 **ATTESTATION**

17 Concurrence in the filing of this document has been obtained from each of the individual(s)  
18 whose electronic signature is attributed above.

19 /s/ Tanya E. Moore

20 Tanya E. Moore  
Attorneys for Plaintiff  
Ronny-marie Wilson  
21  
22  
23  
24  
25  
26  
27  
28

**ORDER**

The parties having so stipulated and good cause appearing,

**IT IS HEREBY ORDERED** as follows:

1. The Court shall expressly retain jurisdiction over this matter for the purpose of adjudicating any motion brought by Plaintiff to recover her attorneys' fees and costs.

2. Plaintiff shall file any motion for the recovery of her attorneys' fees within 45 days of the date of this Order.

3. Except as provided for in paragraph 1, the action is dismissed with prejudice.

**IT IS SO ORDERED.**

Dated: T æ Á F 2021

  
HON. BETH LABSON FREEMAN  
United States District Judge